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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

INTERNATIONAL GAME TECHNOLOGY and
IGT-UK GROUP LIMITED,

Plaintiff,

v.

ILLINOIS NATIONAL INSURANCE CO.,

Defendant.

Case No. 2:16-cv-02792

**STIPULATION AND ORDER TO
EXTEND BRIEFING SCHEDULE
ON PLAINTIFFS' MOTION FOR
LEAVE TO FILE SECOND
AMENDED COMPLAINT**

(First Request)

The parties, by and through their respective counsel of record, hereby stipulate and request that the Court extend the deadline for Defendant Illinois National Insurance Co. ("INIC") to file its Opposition to Plaintiffs' Motion for Leave to File Second Amended Complaint up to and including April 25, 2018. The parties further stipulate and request that the Court extend the deadline for Plaintiffs International Game Technology and IGT-UK Group Limited ("Plaintiffs") to file their Reply in Support of Motion for Leave to File Second Amended Complaint up to and

1 including May 7, 2018. Plaintiffs' Motion for Leave to File Second Amended Complaint was
2 filed on April 6, 2018.¹

3 The requested extensions provide each side approximately three additional business days in
4 which to file their respective briefs. In support of this request, the parties state as follows:

5 1. On April 6, 2018, Plaintiffs filed their Motion for Leave to File Amended Second
6 Amended Complaint. Plaintiffs' Motion is approximately 20 pages long and the attached proposed
7 Second Amended Complaint is approximately 26 pages longer than Plaintiffs' Amended Complaint
8 and includes approximately 77 new allegations. Pursuant to the Court's rules, INIC's Opposition
9 is presently due April 20, 2018.

10 2. Based on the issues raised in Plaintiffs' Motion and the need to review in detail the
11 new allegations Plaintiffs' seek leave to add, as well as INIC's counsel's recent travel to the United
12 Kingdom for depositions in this case and deadlines related to other cases on which counsel for INIC
13 is engaged, INIC requests a brief extension to give counsel sufficient time to oppose Plaintiffs'
14 Motion. This is INIC's first request for such an extension.

15 3. In connection with this request for a brief extension of INIC's time to file its
16 Opposition, Plaintiffs also requested a brief extension of time to file their Reply. This additional
17 time is necessary to provide Plaintiffs' counsel sufficient time to respond to the arguments in INIC's
18 anticipated Opposition. Under the original schedule, Plaintiffs' Reply would be due seven days
19 after INIC's Opposition – April 27, 2018.

20 4. This request for an extension of time is made in good faith and is not sought for any
21 improper purpose.

22 5. Counsel for the parties have conferred and agree to the proposed extensions.

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28 ¹ Plaintiffs initially filed a combined motion on April 5, 2018, but re-filed on April 6, 2018
pursuant to the Court's direction.

WHEREFORE, the parties respectfully request that this Court extend the deadline for INIC to file its Opposition from April 20, 2018 up to and including April 25, 2018, and the deadline for Plaintiffs to file their Reply from April 27, 2018 up to and including May 7, 2018.

DATED: April 18, 2018	DATED: April 18, 2018
BOWLER DIXON & TWITCHELL LLP	FORAN GLENNON PALANDECH PONZI & RUDLOFF PC
By: <u>s/ Andrew F. Dixon with permission</u> Andrew F. Dixon, Esq. Nevada Bar No. 8422 3137 East Warm Springs Road, Ste. 100 Las Vegas, NV 89120	By: <u>s/ Casey G. Perkins</u> Amy M. Samberg, Esq. Nevada Bar No. 10212 Two North Central Avenue, 18 th Floor Phoenix, AZ 85004
REED SMITH LLP John D. Shugrue, Esq. Kevin B. Dreher, Esq. <i>Pro Hac Vice</i> 10 South Wacker Drive, Ste. 4000 Chicago, IL 60606	Casey G. Perkins, Esq. 2200 Paseo Verde Parkway, Ste. 280 Henderson, NV 89052
<i>Attorneys for Plaintiffs International Game Technology and IGT-UK Group Limited</i>	<i>Attorneys for Defendant Illinois National Insurance Co.</i>

ORDER

IT IS SO ORDERED.

DATED April 19, 2018


UNITED STATES MAGISTRATE JUDGE